

**UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF TEXAS  
Dallas Division**

<p>CHARLENE CARTER,</p> <p style="text-align: center;">Plaintiff,</p> <p>V.</p> <p>SOUTHWEST AIRLINES CO., AND TRANSPORT WORKERS UNION OF AMERICA, LOCAL 556,</p> <p style="text-align: center;">Defendants.</p>	<p>Civil Case No. 3:17-cv-02278-X</p> <p><b>NOTICE REGARDING COMPLIANCE WITH THE COURT’S ORDER FOR REDACTIONS AND FILING</b></p>
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Plaintiff Charlene Carter (“Carter”), by and through her undersigned attorneys, hereby submits this notice to inform the Court that, Transport Workers Union of America, Local 556’s (“Local 556”) failed to provide Carter with any redacted files within 5 business days as required by the Court’s January 31, 2022 Order denying Carter’s motions for leave to file under seal. (Dkt. 217). Carter redacted the following documents in accordance with the Court’s instructions: Travel Request Forms,<sup>1</sup> Deposition of Audrey Stone,<sup>2</sup> Rule 30(b)(6) testimony of Jessica Parker,<sup>3</sup> Rule 30(b)(6) testimony of John Parrott,<sup>4</sup> Rule 30(b)(6) testimony of Audrey Stone,<sup>5</sup> and Emails and social media posts.<sup>6</sup>

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<sup>1</sup> Dkt. 171-4, App.58-67, Ex. L; Dkt. 217, pp.3-4.

<sup>2</sup> Dkt. 171-8, App.410-467, Ex. FF; Dkt. 217, pp.5-6.

<sup>3</sup> Dkt. 171-9, App.468-482, Ex. GG; Dkt. 217, pp.6-7.

<sup>4</sup> Dkt. 171-10, App.483-501, Ex. HH; Dkt. 217, p.7.

<sup>5</sup> Dkt. 171-11, App.502-511, Ex. II; Dkt. 217, pp.7-8.

<sup>6</sup> Dkt. 199-6 (App.52-87, Ex. F) and Dkt. 199-7 (App.88-106, Ex. G); Dkt. 217, pp.13-15. Defendant Southwest Airlines Co. (“Southwest”) also made redactions to these emails and social media post exhibits in accordance with the Court’s Order. Dkt. 217, pp.13, 14.

The Court's January 31, 2022 Order denied Carter's motions for leave to file under seal, and ordered Carter, Southwest, and Local 556, to follow the Court's instructions for filing, redacting, and sealing the various documents and information that they contain. (Dkt. 217, p.1). Specifically, the Court ordered redactions and filing, and allowed Southwest and Local 556 to redact certain information in Carter's exhibits, and to provide Carter with the redacted documents within 5 business days of the Order's issuance. *Id.* at p.3-14. Southwest provided Carter with redacted filings. Local 556 did not provide Carter with any redacted filings.

On Tuesday, February 8, 2022, at 8:51 a.m. CT, the day after the Court's 5-business day deadline, Carter's Counsel emailed Counsel for Local 556 to confirm whether the union would be making any redactions. Local 556's Counsel stated its intention to file a notice with the Court by the morning of Wednesday, February 9, to inform the Court that it would provide Carter with redacted files by Friday, February 11. Given Local 556's indication that it would be filing the notice, Carter agreed not to immediately file her brief and exhibits.

Local 556 failed to file the notice with the Court the morning of Wednesday, February 9. To avoid further delay and comply promptly with the Court's order and findings, Carter's Counsel informed Local 556's Counsel that he would prepare the redacted exhibits as provided for in the Order and file them with the Court, which the union did not oppose. Carter has now filed her summary judgment briefs and exhibits in accordance with the Order.

Dated: February 17, 2022

Respectfully submitted,

s/ Matthew B. Gilliam  
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s/ Jason E. Winford (with permission)

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**Certificate of Service**

I hereby certify that on February 17, 2022, I electronically filed the foregoing document with the Clerk of Court by using the CM/ECF system, which will send a notice of electronic filing to all counsel of record.

s/ Matthew B. Gilliam